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**From:** Bahadori, Tina [/O=EXCHANGELABS/OU=EXCHANGE ADMINISTRATIVE GROUP (FYDIBOHF23SPDLT)/CN=RECIPIENTS/CN=7DA7967DCAFB4C5BBC39C666FEE31EC3-BAHADORI, TINA]  
**Sent:** 4/14/2017 8:11:15 PM  
**To:** Thomas, Russell [/o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=12f119e7a3ee447499f3d6ab5d20daeb-Thomas, Rus]  
**Subject:** RE: OCSPP appointment

## Ex. 5 Deliberative Process (DP)

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**From:** Thomas, Russell  
**Sent:** Friday, April 14, 2017 3:57 PM  
**To:** Bahadori, Tina <Bahadori.Tina@epa.gov>  
**Subject:** Re: OCSPP appointment

Any intel on who the AA will be?

Sent from my iPhone

On Apr 13, 2017, at 7:08 AM, Bahadori, Tina <[Bahadori.Tina@epa.gov](mailto:Bahadori.Tina@epa.gov)> wrote:

### Inside EPA - 04/14/2017

#### ACC's Beck, Vocal IRIS Critic, Poised To Join EPA As Deputy Toxics Chief

April 12, 2017

Nancy Beck, a top chemical industry representative and long-time critic of EPA risk assessments, is expected to join EPA next week as the new principal deputy assistant administrator in the Office of Chemical Safety and Pollution Prevention (OCSPP) where she will play a key role implementing the revised toxics law.

Her appointment is likely to be welcomed by chemical industry officials, who have long been concerned that the Trump administration may not want to quickly implement the overhauled Toxic Substances Control Act (TSCA) due to its deregulatory preferences and efforts to scale back EPA.

An informed source says that while EPA has not formally announced Beck's appointment, she will join the OCSPP team April 17 that currently includes current Acting Assistant Administrator Wendy Cleland-Hamnett and Deputy Assistant Administrator Louise Wise -- but it is unclear how Beck's arrival might affect either of those roles.

She will not require Senate confirmation for her position, allowing her to quickly begin work at an agency that is still lacking much of its political leadership.

Neither Beck nor an EPA spokesman returned calls seeking comment.

Once in office, Beck -- the American Chemistry Council's (ACC) director of regulatory affairs and before that a White House Office of Management & Budget (OMB) risk assessment official for almost a decade -- would be expected to be heavily involved in implementing the new TSCA law, particularly adoption of new scientific standards that ACC and others helped craft when the law was written.

In testimony for ACC last month to a Senate Homeland Security & Government Affairs Committee subpanel, Beck said that the new TSCA reflects "the first time Congress directed a Federal Agency to consider not only the best available science but also the weight of the scientific evidence (WoE). . . . EPA now has a mandate to apply high quality, reliable and relevant scientific information."

But she told the March 9 hearing that ACC's "great concern" is that "EPA appears to be interpreting [the new] scientific standards [in the revised TSCA] as implying that 'business as usual' is consistent with the standards."

She said, "EPA is reluctant to explicitly incorporate the best available science and WoE standards into the framework rules that it is developing to implement the [act that overhauled TSCA]. Instead, the Agency has suggested that simple reliance on existing guidelines and current practices are sufficient to meet the standards in [TSCA] Section 26."

Beck is also likely to play a key role overseeing how the Trump administration assesses chemicals' risks for regulatory purposes, including whether OCSPP continues to use assessments produced by the agency's Integrated Risk Information System (IRIS) program -- which the Trump administration is proposing to eliminate -- as the basis for TSCA assessments.

This had been a practice of the Obama administration's TSCA work plan program under then-OCSPP Assistant Administrator Jim Jones. He told *Inside EPA* an interview shortly before leaving office that he expected OCSPP staff to continue utilizing IRIS in risk assessments they undertake as part of their new responsibilities to assess and manage the risks of existing chemicals under the overhauled TSCA.

But as a long-time critic of the IRIS program, Beck would not be expected to rely on IRIS risk values for TSCA assessments.

She could also play a role assisting with the elimination of IRIS, currently housed in EPA's research office, since the Trump administration has proposed eliminating it in its fiscal year 2018 budget, a plan that has surprised few observers given stepped-up efforts to bolster the agency's TSCA program.

A former EPA source has described Beck, one of two toxicologists at the Office of Management & Budget (OMB) during the George W. Bush administration, as a powerful critic of IRIS assessments which had to undergo interagency and OMB review before they could be released in draft or final form.

During that time, EPA officials blamed OMB for lengthy delays in completing IRIS assessments.

During her tenure at OMB, Beck was also among the authors of a controversial OMB bulletin on federal agencies' risk assessment practices, which critics argued could undermine existing regulatory approaches at EPA and elsewhere. Beck was criticized by EPA staff in early 2006 for taking an interagency detail at EPA where she was viewed as being able to influence EPA's comments to OMB on the draft guidance she wrote.

After a critical review from the National Academy of Sciences (NAS) calling for the draft guide to be withdrawn, OMB replaced the bulletin in September 2007 with a scaled-back memorandum that generally reiterated Clinton administration risk assessment principles.

Beck has also written comments on EPA assessments for ACC and blogs on ACC's website reiterating long-running industry criticisms of various parts of the agency's risk assessments and toxics programs. For example, in February 2016 she wrote a blog faulting the agency for not fully implementing NAS recommendations from 2011 on how EPA could improve IRIS assessments.

"It is unfortunate that after five years, IRIS is still producing deficient assessments that do not reflect the 2011 NAS recommendations," she wrote at the time.

**On her LinkedIn page, Beck describes herself as a PhD toxicologist with 15 years** of "applied public health experience" with a "[s]pecialized ability to provide a broad policy perspective as well as detailed technical comments. Deep understanding of U.S. regulatory process. Accomplished in bringing a scientific dialogue to the policy discussion to inform critical decision-making. Skilled in leading and directing interagency negotiations to improve policy."

Beck says that her "[s]uccessful collaborations have involved partnerships with senior staff and policy officials throughout the Executive Office of the President and Federal agencies."

Beck worked from July 1988 to August 1990 as a microbiologist with the Estee Lauder Group of Companies, before joining EPA as an AAAS science technology policy fellow from September 2000 to August 2002, according to her LinkedIn page.

She then joined OMB in August 2002 during the Bush administration as a toxicologist, risk assessor and policy analyst where she "[u]tilized toxicology expertise to bridge the science and policy gap by framing and identifying scientific issues for an active policy debate."

Beck continued at the White House until January 2012 when she took on her current role at ACC as senior director of regulatory policy. -- *Anthony Lacey & Maria Hegstad*

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